

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACQUELINE STEVENS,

Plaintiff,

V.

U.S. DEPARTMENT OF HOMELAND
SECURITY, IMMIGRATION AND
CUSTOMS ENFORCEMENT,

Defendant.

No. 17 C 2853

Chief Judge Pallmeyer

**DEFENDANT’S UNOPPOSED MOTION FOR
LEAVE TO FILE BRIEF IN EXCESS OF 15 PAGES**

Defendant United States Department of Homeland Security, Immigration and Customs Enforcement (“ICE”), by John R. Lausch, Jr., United States Attorney for the Northern District of Illinois, moves pursuant to Local Rule 7.1 for leave to file a brief in excess of 15 pages. In support of the motion, ICE states as follows:

1. ICE is responding to plaintiff Jacqueline Stevens's motion for summary judgment and cross-moving for summary judgment in this Freedom of Information Act case in which Stevens asserts that ICE failed to conduct an adequate search for records and improperly withheld information in response to her February 2017 FOIA request for correspondence relating to United States citizenship claims.

2. In response to Stevens's FOIA request, ICE conducted a reasonable search for responsive records, identified 6,042 pages of responsive records, and released all information to Stevens that was not exempt from disclosure under FOIA exemptions 5, 6, 7(C), and 7(E).

3. ICE requests leave to file the attached 29-page combined summary judgment response and memorandum in support of its cross-motion for summary judgment because

additional pages were needed for ICE to fully explain: (a) the records Stevens seeks; (b) the search ICE conducted in response to Stevens's FOIA request; (c) the withholdings ICE applied to responsive records; and (4) the bases for these withholdings under the FOIA. *See* Ex. A.

4. The undersigned emailed Stevens's attorney about this motion, and Stevens's attorney informed the undersigned that Stevens does not object to the motion.

WHEREFORE, defendant requests leave to file a 29-page combined response to plaintiff's motion for summary judgment and memorandum in support of its cross-motion for summary judgment.

Respectfully submitted,

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United States Attorney

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